

Planning Statement

Site address 58 Ferringham Lane, Ferring, BN12 5LU



Application for Full Planning Permission

On behalf of Summerdown Homes Ltd

February 2018

Client: Summerdown Homes Ltd
Site Location: 58 Ferringham Lane, Ferring, BN12 5LU

Job History:

Version	Date	Author	Checked	Notes
Draft v1	05/02/18	STB		
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1.0 INTRODUCTION AND SUMMARY

- 1.1 This statement is submitted in respect of the application for full planning permission for the redevelopment of a disused care home to provide for 7 self contained flats. The site address is 58 Ferringham Lane, Ferring, BN12 5LU.
- 1.2 The proposed scheme has been discussed informally with neighbouring residents in order to accommodate local ideas as much as possible. Local residents will be able to provide the local planning authority with their formal comments over the course of the planning application.
- 1.3 The “existing” care home closed in 2017. This is not surprising as the home’s limited size (around 13 bedrooms) would not be viable in the current economic climate – where larger homes (that are set out in a manner that permits for higher levels of medical care) are required in order to benefit from economies of scale. The Council’s adopted development plan does not include any policies that require special justification for the loss of nursing homes, and the proposed development will make a positive contribution towards the supply of housing in the District. Under such circumstances, the principle of a development providing for a net increase of 7 dwellings is acceptable.
- 1.4 The scheme has been designed by experienced local Sussex based architects (Turner Associates) and takes a traditional design approach that will respect and compliment the character and appearance of the surrounding area. The scheme provides for car parking in line with adopted standards, and will preserve the amenities of neighbouring residents. For these reasons it can be seen that the proposed development accords with local and national planning policy and should be approved in line with the presumption in favour of sustainable development.
- 1.5 Please note that the planning application submission comprises the following documents:
- Application Forms and Ownership Certificate
 - Planning Statement
 - Arboricultural Assessment and Method Statement (Nicholas Jones Consultants)
 - Daylight Report (Delta Green)

- Transport Report (Reeves Transport Planning)

And the following plans and elevations from Turner Associates:

- TA 1078 /01: Location Plan and Block Plan
- TA 1078 /02: Existing Site Survey
- TA 1078 /03: Existing Ground Floor Plan
- TA 1078 /04: Existing First Floor Plan
- TA 1078 /05: Existing Second Floor Plan
- TA 1078 /06: Existing Elevations
- TA 1078 /07: Existing Elevations
- TA 1078 /08: Existing Streetscene Elevation
- TA 1078 /09: Existing Sections
- TA 1078 /10: Proposed Site Plan
- TA 1078 /11: Proposed Ground Floor Plan
- TA 1078 /12: Proposed First Floor Plan
- TA 1078 /13: Proposed Second Floor Plan
- TA 1078 /14: Proposed Front Elevation
- TA 1078 /15: Proposed Front Elevation (including front boundary treatments)
- TA 1078 /16: Proposed Side Elevation
- TA 1078 /17: Proposed Rear Elevation
- TA 1078 /18: Proposed Rear Elevation (including rear garden fences)
- TA 1078 /19: Proposed Side Elevation
- TA 1078 /20: Comparative Streetscene Elevations (existing and proposed)

2.0 SITE DESCRIPTION

- 2.1 The application site accommodates a circa 1930s detached building last used as a care home.

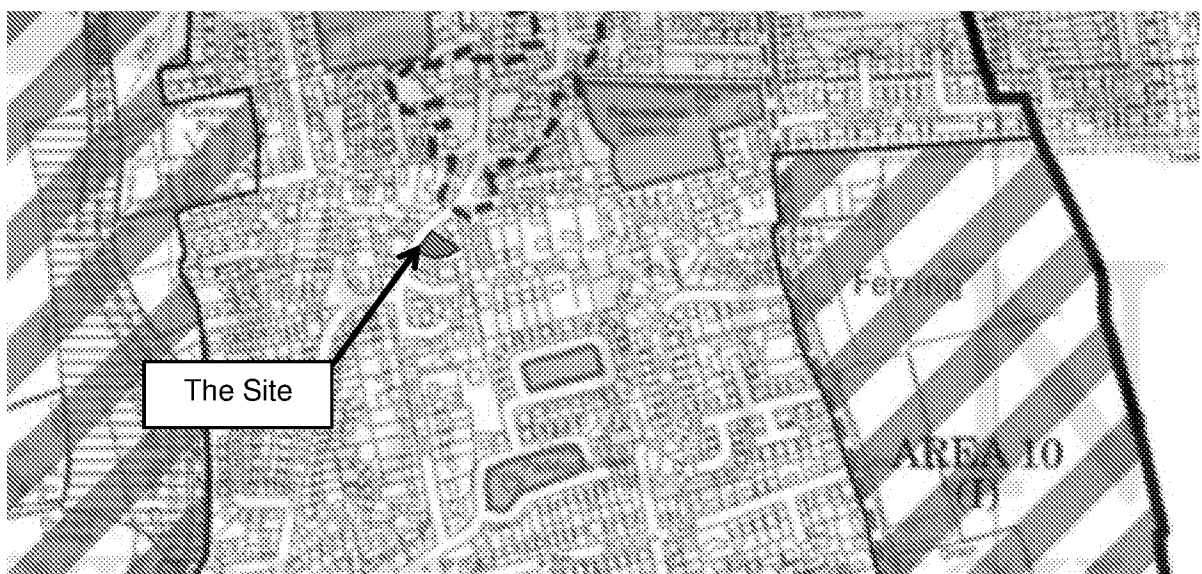
Street elevation views of the existing building:



View of rear elevation, taken from garden serving the site:



- 2.2 The site is not located within any defined conservation area. As confirmed in the Local Plan Proposals Map extract shown below, there is a conservation area located to the north of the site (shown by a blue dashed line). The conservation area would not be affected by the current proposals.



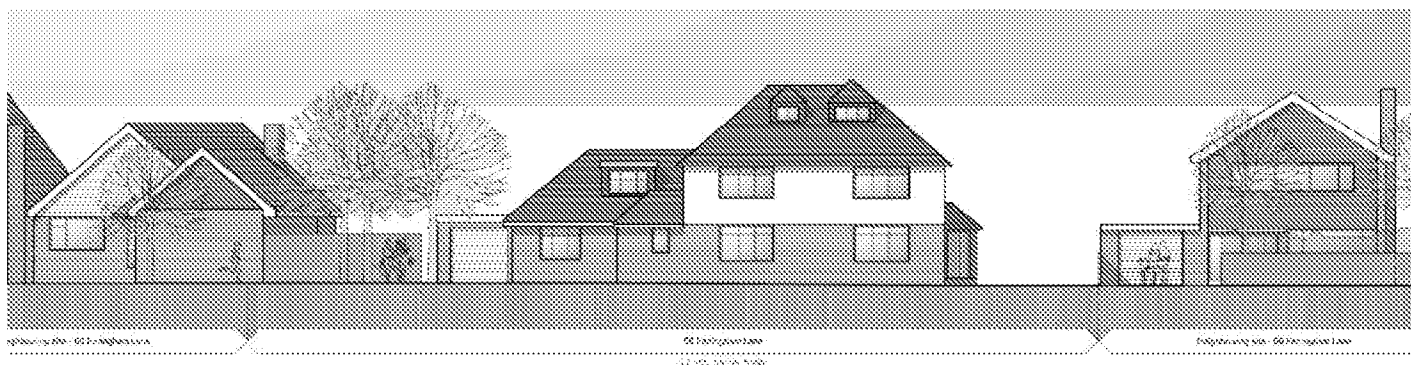
3.0 RELEVANT PLANNING HISTORY

- 3.1 An outline planning application for “flats in two storeys” was withdrawn back in 1960. No further details are available.
- 3.2 Planning permission for the conversion of the building into a rest home was first granted in 1988 under local planning authority reference FG/30/88.
- 3.3 Extensions to facilitate the conversion were approved later that year under local planning authority reference FG/102/88.
- 3.4 Further extensions to the property were approved in 1992 (local planning authority reference FG/3/92).
- 3.5 Permission to convert the garage into additional accommodation was granted in 2012 (reference number FG/90/12).

4.0 THE PROPOSED DEVELOPMENT

- 4.1 The application seeks consent for the redevelopment of the site to provide for 7 self-contained flats. Redevelopment is proposed as the existing building is in a very poor state of repair, and suffers from a very illogical layout of rooms and corridors (a consequence of its history of piecemeal extensions). In addition, many of the existing windows serving upper floor rooms are located in the side elevations of the building – giving rise to significant overlooking opportunities. The redevelopment of the site allows for a more rational layout of rooms – with the majority of windows being located in the front and rear elevations in order to improve privacy levels for neighbouring residents.

Existing Street Elevation:



Proposed Street Elevation:



- 4.2 As can be seen in the image below (showing the proposed building, with the existing building shown edged red), the overall height of the building remains commensurate with the height of the existing building, whilst its width will be marginally increased in lieu of reductions in depth (see 4.3 below).



- 4.3 With regard to site layout, it can be seen that the depth of the building will be reduced, bike storage will be located to the rear, and bin storage and 9 car parking spaces will be located at the front of the site.



- 4.4 As noted in paragraph 4.1 of this statement, the redevelopment of the site provides an opportunity to reduce the amount of side facing windows in the upper elevations of the building. This will improve privacy levels for neighbouring residents.

Existing North Side Elevation:



Proposed North Side Elevation:



Existing South Side Elevation:



Proposed South Side Elevation:

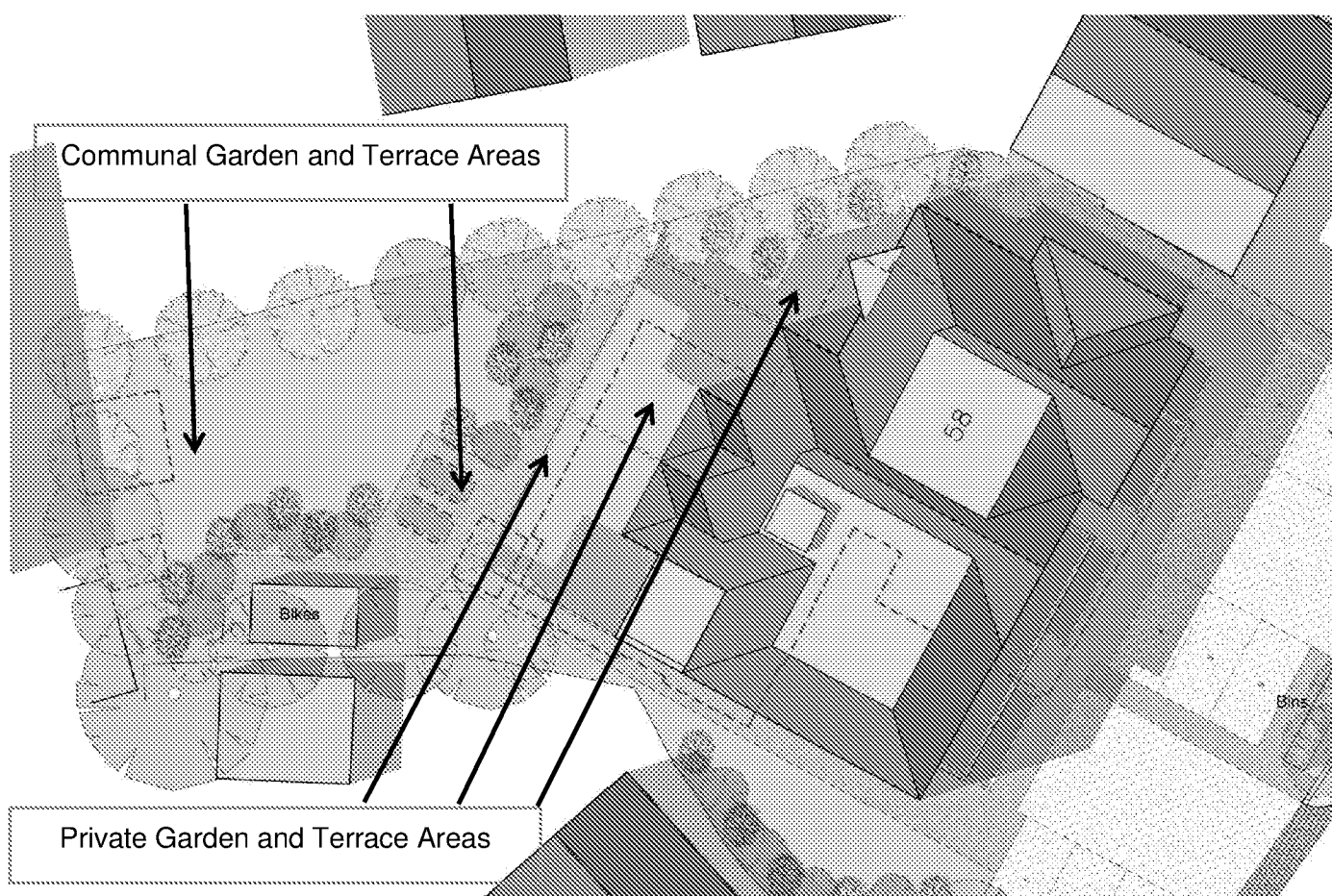


- 4.5 The scheme provides for 7 self contained flats. A schedule of proposed accommodation, including reference to nationally described space standards for new dwellings, is provided overleaf. All units exceed national standards.

Unit	Unit Type	Size (m ²)	National Standard (m ²)
1	2 Bed 4 person	92	70
2	2 Bed 4 person (duplex)	98	79
3	2 Bed 4 person	91	70
4	2 Bed 4 person	91	70
5	2 Bed 4 person	93	70
6	2 Bed 4 person	80	70
7	3 bed 6 person	141	95

- 4.6 Note that ground floor units 1, 2 and 3 will all have private patio/garden areas, and all units will have access to communal garden and terrace facilities. Upper floor units will also have balcony/terrace areas.

Site Plan showing private and communal garden areas (see also image overleaf):



Ground Floor Plan showing private gardens in more detail:



5.0 RELEVANT PLANNING POLICY

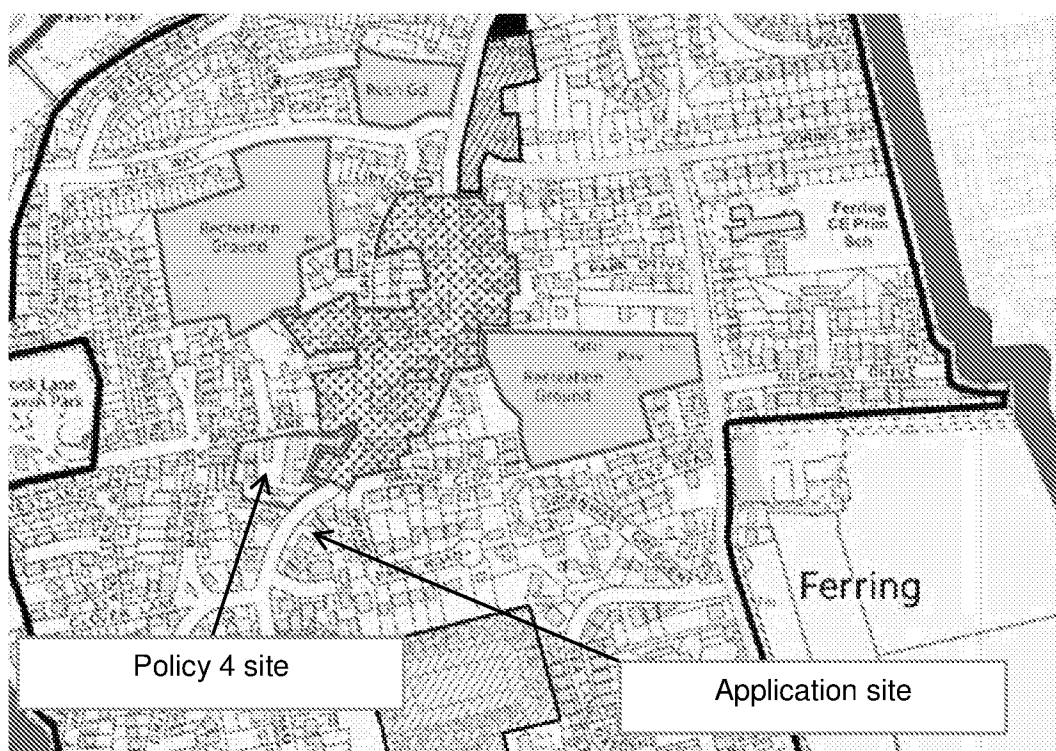
- 5.1 The adopted development plan for the area comprises the saved policies from the 2003 Local Plan, and the Ferring Neighbourhood Plan. The National Planning Policy Framework and national Planning Practice Guidance are material considerations in the determination of planning applications, as is the emerging Local Plan 2011 to 2031.
- 5.2 An assessment of how the scheme complies with relevant planning policy is provided in Section 6 of this Statement.

Saved 2003 Local Plan policies:

- GEN2: Defines the extent of the built up area – where development is to be focused. Note that 58 Ferringham Lane is located within the built up area.
- GEN3: Confirms the Local Plan requirement for 8,700 dwellings between 1996 and 2011.
- GEN7: Sets out the general standards required of new development, including design, impact on neighbours, retention of trees, highways safety and vehicle parking facilities.
- GEN9: Provision for foul and surface water drainage.
- GEN12: Parking in new developments.
- GEN15: Cycle parking in new developments.
- GEN18: Crime Prevention.

Ferring Neighbourhood Plan:

- Policy 1: Provides support for development on sites within the built up area boundary, and sites close to the village centre.
- Policy 4: Provides support for new housing on a site opposite the application site (note that the development of the application site in no way prejudices the development of the site opposite).



- Policy 5: Sustainable drainage systems to be included within new development.

Note also that the neighbourhood plan supports the principle of smaller open market dwellings (as proposed at 58 Ferringham Lane). On page 22 of the Plan, whilst discussing the principles of development on another site (Land rear of Henty Arms) , the Plan states:

'However, the community engagement activities indicate a clear demand from older households within the parish to 'downsize' to smaller, open market dwellings of the type proposed by the policy (and freeing up homes suited to families in the process)'.

Emerging Local Plan 2011 to 2031:

- SD SP1: Support for sustainable development
- SD SP2: Support for development inside the built up area boundary
- H SP1: Sets out a target of 20,000 new homes between 2011 and 2031, including 3,050 between 2011 and 2015, and 5,600 homes between 2016 and 2021.
- H DM1: Proposes a mix of dwelling types and sizes, with affordable housing required on sites providing 11 or more dwellings.
- AH SP2: Affordable housing will be required on schemes providing 11 or more dwellings
- D SP1: Encourages efficient use of sites, and a high standard of design that respects local characteristics.
- D DM1: Sets out main design considerations for new development.
- D DM2: Confirms that the Council will have regard to national space standards for new dwellings.
- ECC SP1: Encourages “sustainability” within the design process.
- ECC SP2: New development will accord with current standards for sustainability
- T SP1: Confirms that appropriate levels of car and cycle parking should be provide, and that development would be “safe” with regard to highways conditions.
- T DM1: Development should be accessible to local services, and provide for cycle storage etc
- W DM3: Sustainable Urban Drainage Systems

National Planning Policy Framework

- Paragraph 7: Defines sustainable development as development performing an economic role, a social role and an environmental role.
- Paragraph 14: Sets out the presumption in favour of sustainable development.
- Paragraph 17: States that planning should proactively drive and support sustainable economic development. States that planning should seek to secure high standards of design and amenity. (Note that economic growth includes all types of development – including residential development.)
- Paragraph 19: States that “significant weight” should be placed on the need to support economic growth through the planning system.
- Paragraph 49: Housing applications should be considered in the context of the presumption in favour of sustainable development.
- Paragraph 56 to
Paragraph 66: Set out in more detail the Government’s design values – encouraging good design that improves the character and quality of an area and the way it functions.
- Paragraph 187: Advises that decision takers at every level should seek to approve applications for sustainable development.
- Paragraph 196: The National Planning Policy Framework is a material consideration in the determination of planning applications.
- Paragraph 215: The weight to be given to Local Plan policies should be assessed with regard to the degree to which they comply with the National Planning Policy Framework.

6.0 PLANNING ASSESSMENT

6.1 From the above planning policy references, it can be seen that the main issues to consider in determining the application are:

- The principle of development, including the type of housing required and reasons as to why no affordable housing is required for the development.
- The scheme's impact on neighbouring residents, including how neighbours have been consulted on the scheme, and how the scheme has been amended (where possible) to take account of neighbours' comments.
- The scheme's visual impact.
- The scheme's highways impact.
- Sustainability, Trees and Drainage matters.
- Section 106 matters

These matters are dealt with in greater detail below.

Principle of Development

6.2 As noted in the introduction to this Statement, there are no adopted (or emerging) development plan policies that require special justification for proposals that result in the loss of care home accommodation. Consequently, a scheme that provides for a net increase of 7 self-contained housing units on a site located within the Built Up Area boundary should be considered acceptable in principle. The Council have very pressing housing supply requirements – with the annual monitoring report for 2016-2017 stating that the Council only has 2.08 years supply of housing (against a national requirement to be able to show at least a five year supply of housing land). Whilst this situation should

improve once the emerging Local Plan (2011-2031) is adopted, the benefits of providing additional housing on such a “windfall” site should not be underestimated. The scheme therefore accords with Local Plan 2003 policies GEN2, GEN2 and GEN3, Ferringham Neighbourhood Plan policy 1, and emerging Local Plan 2011-2031 policies SD SP1, SD SP2 and H SP1.

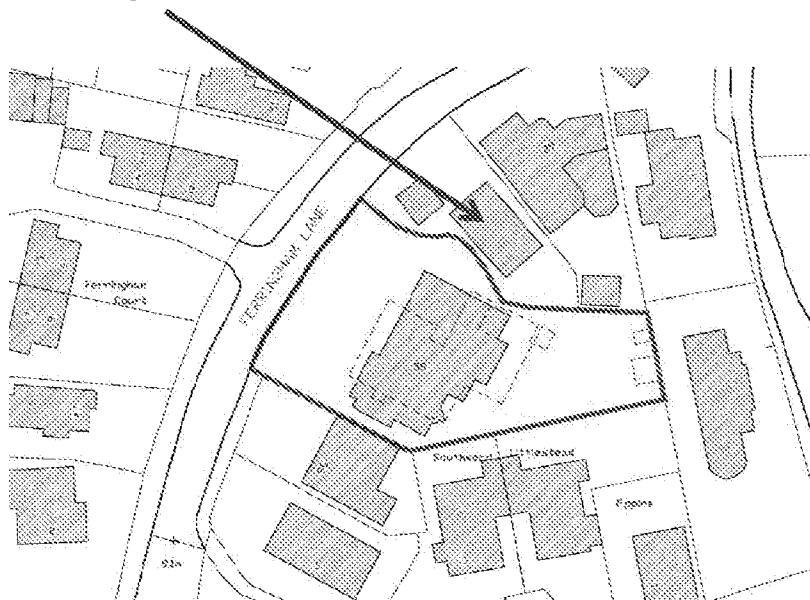
- 6.3 The scheme provides for a range of unit types. There is one 3-bedroom unit and six 2-bedroom units. Unit sizes range from 80 to 141m². All units have access to shared outside amenity space, and three units have access to private garden space. All units have access to private patio or balcony/terrace space. The range of proposed dwelling sizes ensures compliance with emerging Local Plan 2011-2031 policy H DM1.
- 6.4 The scheme proposes 7 units of housing. This is below the 11 unit threshold for providing affordable housing (as set out in national Planning Practice Guidance and emerging Local Plan Policy AH SP2).
- 6.5 The principle of development is acceptable – as set out above. The scheme meets with the three definitions of “sustainable development” as set out in national planning policy, and so should be considered in the light of the presumption in favour of sustainable development. The three definitions of sustainable development are:

Social Role	–	the provision of new housing.
Economic Role	–	support for the construction industry during the construction phase, the receipt of Council Tax during the occupation phase.
Environmental Role	–	the visual improvements that accrue from the redevelopment scheme.

Impact on Neighbouring Residents

- 6.6 The scheme has been designed to ensure an acceptable impact on neighbouring residents. As part of the scheme's development up to the planning application stage, the applicants met with surrounding residents in order to show them the draft proposals in order to take into account residents' wishes where possible. Each relevant neighbouring property is highlighted below. Neighbouring residents will be able to formally submit consultation responses to the Council once the planning application has been registered.

60 Ferringham Lane



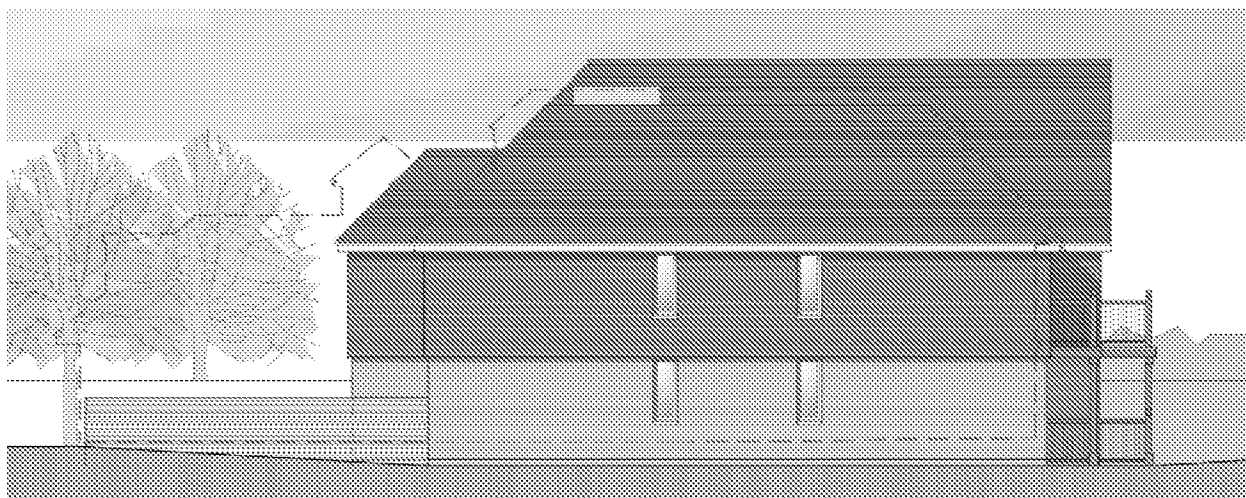
- 6.7 The site was viewed from 60 Ferringham Lane – where it became apparent that the main view of the development would be from number 60's rear garden (see image overleaf). Having viewed the application site from the rear garden, it was apparent that the rear wing of the proposed development needed to be reduced in scale. The owners of number 60 also raised concerns regarding the proximity of a bin / bike store, and the potential impact on side facing windows in number 60. As a consequence of this, the scheme has been amended with a reduced scale rear wing, and a daylight report has been commissioned to check on the scheme's impact on side facing windows. The bike and bin stores have all been relocated.

View of rear wing from garden of number 60:

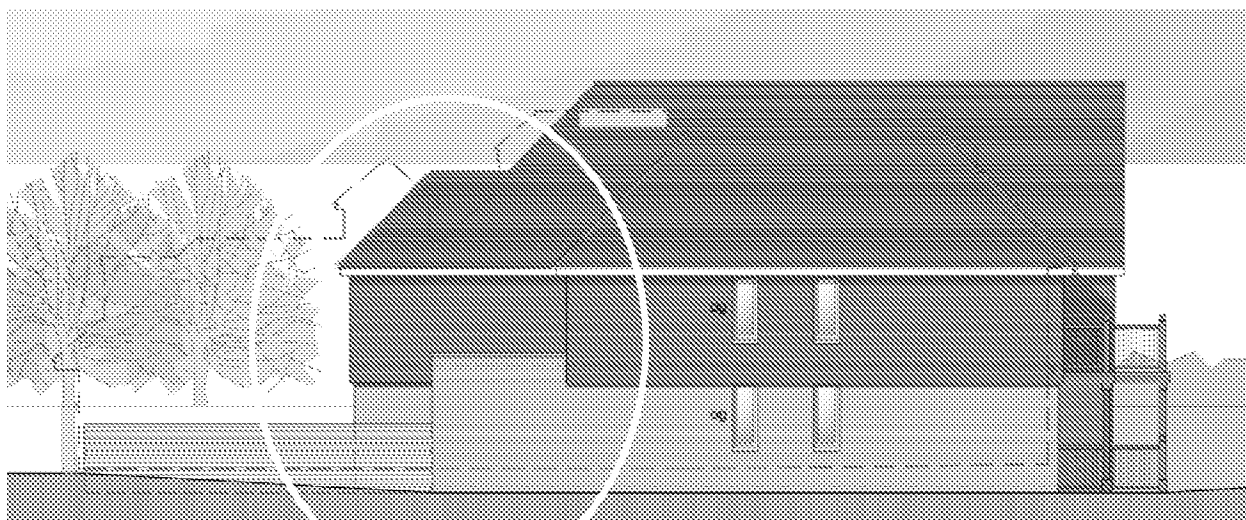


Images showing how the scheme has been amended are provided overleaf.

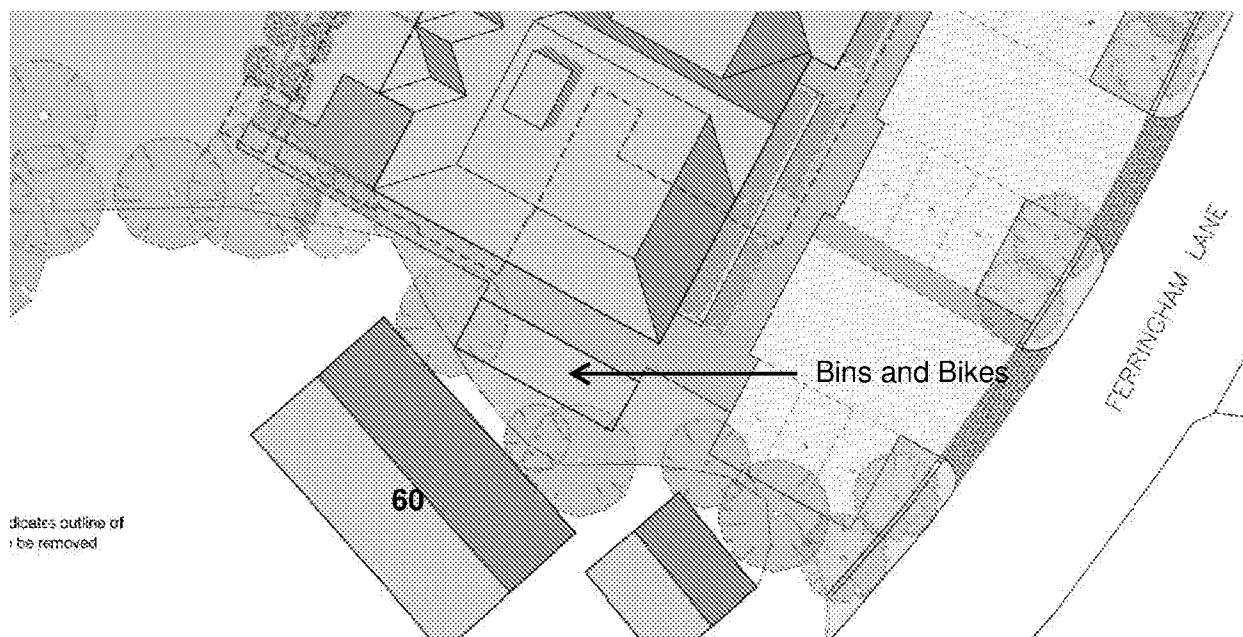
“Pre-application” image of development – as seen from rear garden of number 60:



“Current application” image of development – note how that part of the scheme nearest to number 60 has been reduced in depth at first floor level.



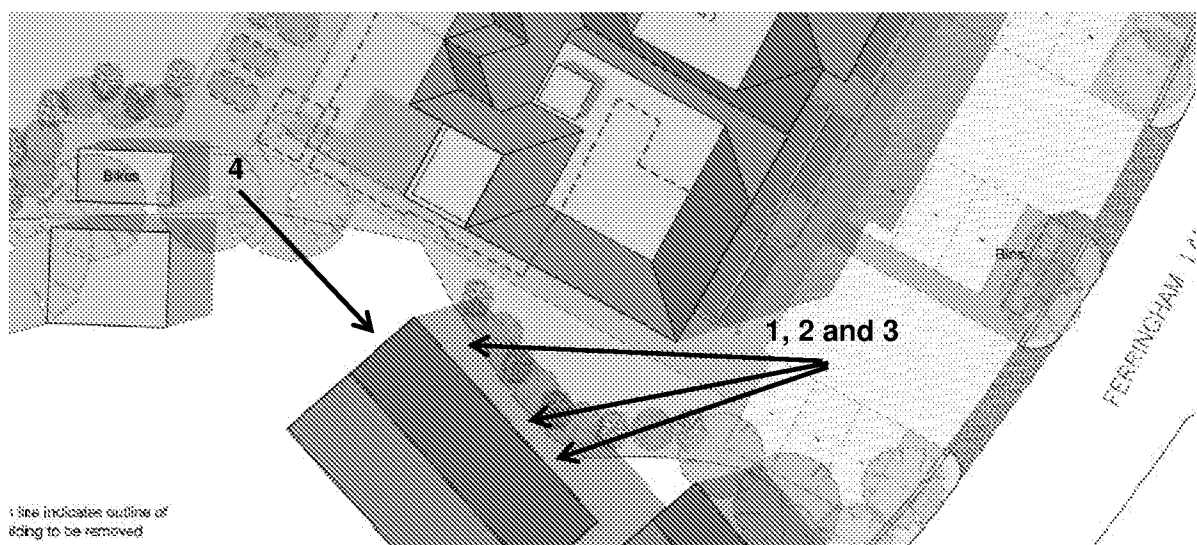
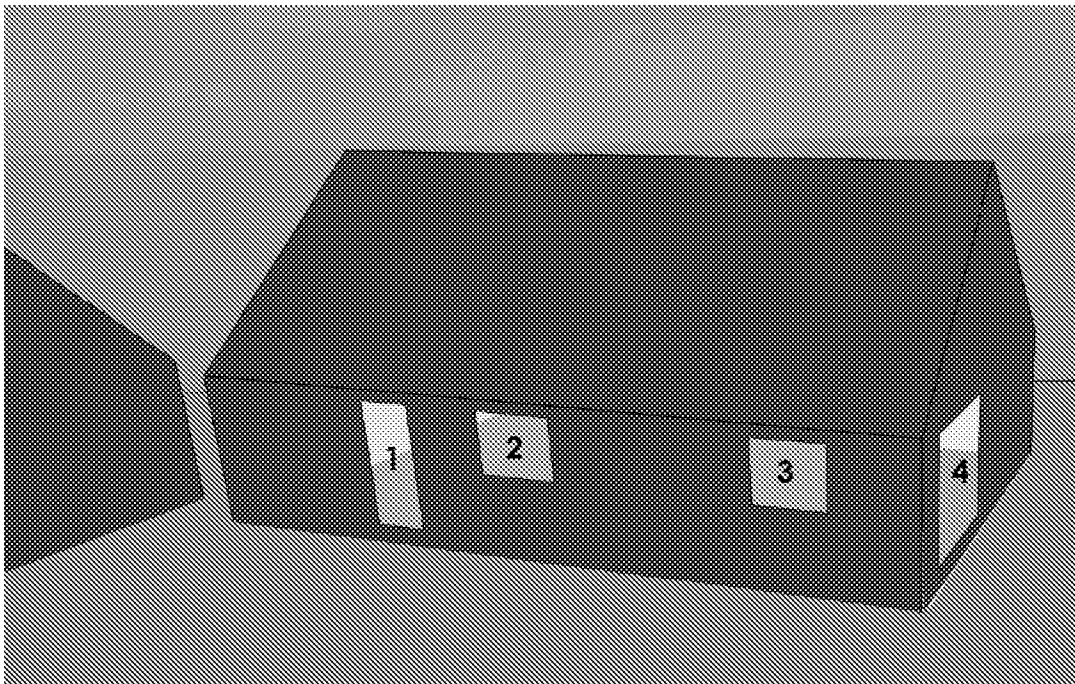
Pre-application Site Layout Plan (bins and bikes highlighted):



Current application Site Layout Plan (bins and bikes highlighted)



- 6.8 With regard to the scheme's "daylight impact" on the side facing windows of number 60, a daylighting report has been provided by Delta Green. The Delta Green report looks at four main windows in number 60: the rear patio windows (window 4 on the image below), two side facing windows serving the main living area (windows 2 and 3 on the image below, and note that the main living area is also served by window 4), and the glazed door serving the kitchen at the front of the house (window 1 in the image below).

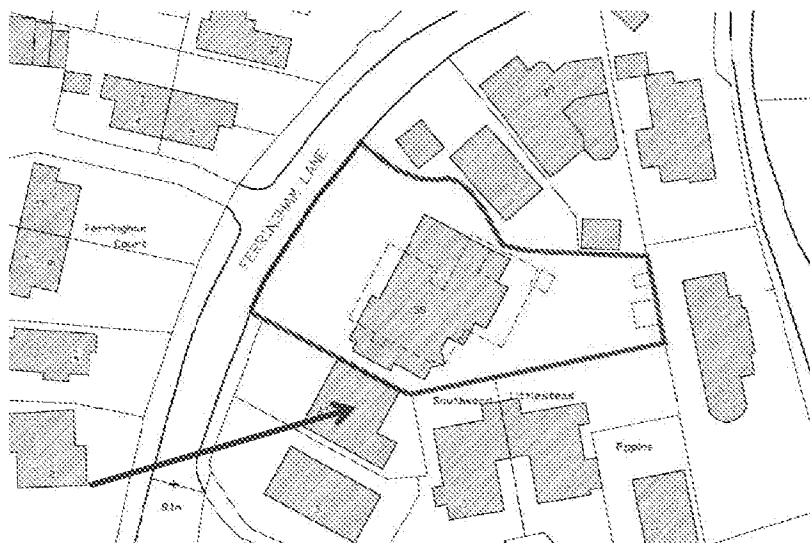


(dashed line indicates outline of building to be removed)

- 6.9 The daylight report finds that the scheme will have an acceptable impact on all of these windows. For a scheme to have an unacceptable impact on a window, it must reduce the “vertical sky component” (VSC) by at least 20%, and reduce the VSC to below 27%. The Delta Green report finds that all four windows will maintain a “vertical sky component” of 27% - which is in line with Building Research Establishment guidelines, and in the case of windows 1, 2, and 4, the reduction in daylight will be less than 20%. For window 3, the reduction in daylight will only just be over 20% (a 20% reduction would have generated a VSC of 27.2%, whilst for the application scheme, the VSC will be 27%). Given these figures, it can be seen that the proposed scheme will have an acceptable impact on windows serving number 60 Ferringham Lane.
- 6.10 The Delta Green report also measures the Annual Probable Daylight to the main living room window (window 4 – the rear patio) and overshadowing levels to the rear garden. The report finds that both of these measures are within Building Research Establishment guidelines for new development.
- 6.11 Finally, please note that the applicants are in advanced talks with the owners of number 60 with regard to transferring some land over to number 60. Number 60 currently has a boundary fence located very close to its side facing windows, and so there is an opportunity for the fence line to be brought in to create more space. Such discussions are outside the scope of this planning application – and so are highlighted here for information purposes only. However, the likely revised boundary line is shown in the image below (see shaded area):



56 Ferringham Lane



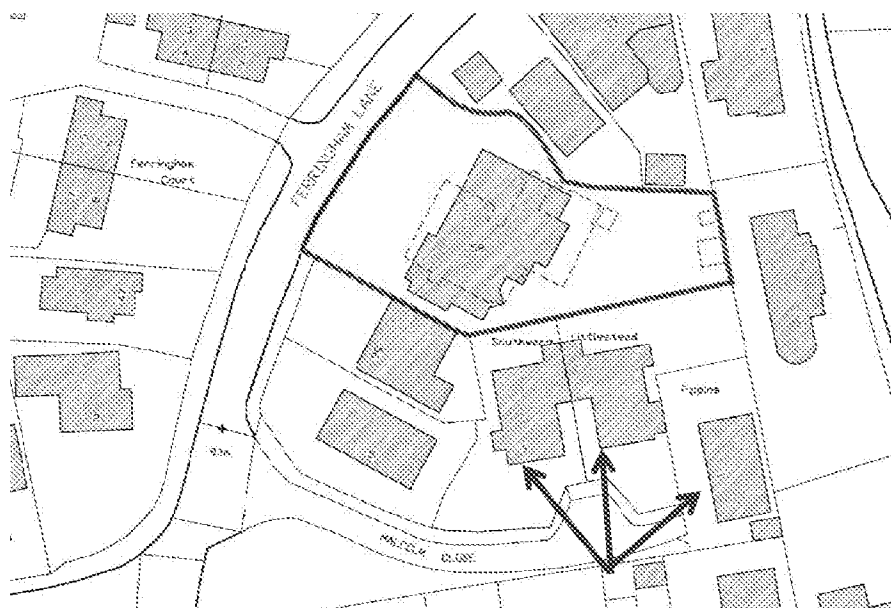
6.12 With regard to number 56 Ferringham Lane, the owners confirmed by email that *“Our initial comment is that the general aspect is pleasing and our concerns about loss of privacy at the rear of source [sic] property appear to be unfounded.”* However, the neighbours did then raise other concerns which can be summarised as:

- a. Concern that there is not sufficient car parking for the scheme, and that this would exacerbate visibility along Ferringham Lane. They would prefer a landscaped frontage. Would like rear access along the north side of the building to provide for more car parking at the rear of the site.
- b. Raised concerns that the rear garden is very large – and may be potentially developed for an additional house in the future.
- c. Landscaping: would not want existing views of trees compromised by additional landscaping. Landscaping proposals need to take account of such views.

6.13 With regard to the above, we are grateful for the neighbours confirming that they have no concerns regarding overlooking. Officers will note that overlooking will be reduced as a result of the development – as confirmed in the side elevation images provided on page 12 of this Statement.

- 6.14 With regard to comments on the level of car parking, a highways report has been commissioned. The highways report confirms:
- 9 car parking spaces are to be provided (against a maximum standard of 10 spaces).
 - Sightlines from the site's proposed access points are based on visibility being provided over land within the ownership of number 60 Ferringham Lane. This is also true for sightlines serving the existing access points. The proposed sight lines are better than the existing sight lines.
 - Traffic levels serving the proposed development will be the same for the proposed development as for the existing permitted use of the site (18 traffic movements between 0700 hours and 1900 hours).
- 6.15 With regard to the location of car parking, the only reasonable location for the car parking is at the front of the site. This allows for a simplicity of vehicle movements (so less noise and disturbance), and strong levels of natural surveillance for parked cars.
- 6.16 With regard to future development of the rear garden, we can confirm that the site owner has no intentions to put additional housing in the rear garden. The rear garden is required as communal space for the 7 flats.

Malcolm Close:



- 6.17 Residents in these three houses appeared happy with the plans when showed to them earlier in 2017. Subsequent email correspondence with the owners of 56 Ferringham Lane (see above) confirmed that whilst residents were happy with the scheme's design, residents were concerned over car parking levels and highways impact. As noted above, the Reeves Transport Planning transport report confirms that car parking levels are acceptable for the proposed scheme, and that traffic generation is the same as for the permitted use. Note also that the proposed development will have no impact whatsoever on visibility for cars entering or leaving Malcolm Close.
- 6.18 The applicants have gone to considerable lengths to take account of the comments of neighbouring residents. The physical design of the scheme has been amended to overcome initial concerns expressed by residents in 60 Ferringham Lane, and residents at 56 Ferringham Lane and Malcolm Close confirm that they are happy with the design approach taken for the development.
- 6.19 Residents at 56 Ferringham Lane and Malcolm Close remain concerned over traffic generation and car parking levels – but as confirmed in the Reeves Transport Planning report, these aspects of the scheme are already considered to be acceptable. The

scheme is acceptable with regard to its impact on the amenities of local residents, and so accords with adopted Local Plan policy GEN7 and emerging Local Plan policy D SP1.

Visual Impact

- 6.20 The proposed development will enhance the appearance of the site. The existing building is very dilapidated (see image on front cover), and the proposed development will be far superior. The proposed design respects the early / mid 20th century design character of the surrounding area, and provides new front boundary treatments that will strengthen the site's appearance within the streetscene.

Proposed Front Elevation, including boundary treatments:



- 6.21 The development reinforces local distinctiveness by incorporating features found elsewhere in the area:

- Pitched roofs with gable end features
- Tiles hanging at upper floor level
- Creation of front boundary walls
- Good separation to the site's side boundaries.

- 6.22 Such features show that the proposed building is correctly scaled and well designed. The scheme therefore accords with Local Plan policy GEN7, and emerging Local Plan policies D SP1 and D DM1. The scheme provides for good levels of surveillance of the rear garden

areas and front car parking area, and so accords with the Council's Crime Prevention policies (Local Plan policy GEN18 and emerging Local Plan policy D DM1).

Highways impact.

6.23 Highway's matters are covered in the Transport Report provided by Reeves Transport Planning. The report confirms:

- 9 car parking spaces are to be provided (against a maximum standard of 10 spaces).
- Sightlines from the site's proposed access points are based on visibility being provided over land within the ownership of number 60 Ferringham Lane. This is also true for sightlines serving the existing access points. The proposed sightlines are better than the existing sightlines.
- Traffic levels serving the proposed development will be the same for the proposed development as they are for the existing permitted use of the site (18 traffic movements between 0700 hours and 1900 hours).

6.24 The report confirms that with the provision of on site car parking and cycle parking, improvements to sight lines and no net generation of vehicle movements, the scheme complies with the Council's planning policies on transportation matters.

Sustainability, Trees and Drainage matters

6.25 The scheme has been designed to accord with latest standards under the Building Regulations. This is in line with emerging policies ECC SP1 and ECC SP2. In order to achieve this, the following features are contained within the development:

- locally sourced materials wherever possible,
- high thermal values for insulation,

- double glazed windows will be used throughout,
- High efficiency gas fired boilers to be installed
- Energy Efficient lighting installed throughout the building,
- Aerators will be fitted to all tap heads,
- A++ “white goods” will be installed throughout, and
- Dual Flush toilets will be installed.

6.26 With regard to trees, please refer to the Nicholas Jones Consultants’ Arboricultural Assessment and Method Statement. This report confirms:

- There are 14 trees on the site, of which 11 are Category C trees (low value trees with more than 10 years lifespan remaining), and 3 are Category U trees (low value trees with less than 10 years lifespan remaining).
- 7 of the Category C trees and all 3 Category U trees are to be removed or pruned.
- The other 4 Category C trees are to be retained.
- Extensive re-planting is proposed.

6.27 The trees which are to be removed are all of low quality, and so their removal does not raise any planning issues. Replacement planting is proposed which will enhance the appearance of the site. A planning condition can be applied to any grant of planning permission that requires prior approval of the planting scheme. Replacement planting should take account of the comments raised by the owners of 56 Ferringham Lane (that they would like planting close to their boundary to be relatively low level so as not to obscure longer views out of their garden).

6.28 With regard to drainage, it should be noted that the foul drainage demands on the site will be similar to the existing permitted use of the site. The permitted use of the site allows for 13 residents, plus staff – so it is reasonable to assume a population of around 15 to 20 people on the site. The proposed seven flats will have a similar population. A detailed scheme for foul water drainage can be secured by planning condition.

- 6.29 With regard to surface water drainage, it should be noted that there is little change to the overall footprint of buildings (more a reconfiguration of the building's footprint), and that areas of hardstanding shall be finished with permeable paving. As with foul water drainage, a detailed drainage scheme can be controlled by condition.
- 6.30 The scheme takes account of surface water and foul water drainage, and detailed drainage schemes will be secured under planning conditions. The scheme therefore accords with Local Plan policy GEN9, Neighbourhood Plan policy 5, and emerging Local Plan policy W DM3.

Section 106 matters

- 6.31 We understand that the Local Planning Authority has not yet formally adopted its charging schedule for Community Infrastructure Levy payments. Consequently there may be payments liable under Section 106 of the Planning Acts towards various infrastructure matters.
- 6.32 In line with good practice, we would appreciate being provided with early notification of any payments that may be requested, together with justification as to why such monies are required.

7.0 CONCLUSIONS

- 7.1 The application seeks full planning permission for the redevelopment of the site to provide for 7 self contained flats, with cycle parking and 9 car parking spaces.
- 7.2 The existing permitted use of the site is as a care home. The care home closed in 2017. The home suffered from a limited number of bedrooms, and a poor “piecemeal” layout meaning that the home was not suitable for specialist care. The local planning authority has no planning policies that seek the retention of care homes.
- 7.3 The proposed development makes a positive contribution to the Council’s challenging housing supply requirements, and provides housing in a well designed building that will compliment the character and appearance of the surrounding area.
- 7.4 The development provides for a high standard of accommodation, with all 7 units being sized in excess of national housing standards, and all units having access to both private and shared amenity space.
- 7.5 The scheme has been amended after discussions with local residents. The scheme is therefore acceptable with regard to its impact on local residents with regard to outlook, daylight and privacy.
- 7.6 The scheme provides for cycle parking and car parking in line with adopted standards, and sightlines are to be improved. The scheme does not generate any greater traffic movements than would have been the case when the care home was still trading.
- 7.7 In light of the above considerations, it can be seen that the proposed development accords with adopted and emerging development plan policy. Consequently the planning application should be approved in line with the presumption in favour of sustainable development.